



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

August 4, 2003

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

RE: DBA Venture Welding, Inc. T039-16088-00130

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, Indiana 46204, **within thirty (30) days from the date of this notice**. The filing for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision or other order for which you seek review by permit number, the name of the applicant, location, the date of this notice, and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

(over)

FNTVOP.wpd 7/24/03

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNTVOP.wpd 8/21/02



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**DBA Venture Welding, Inc., Division of Banks Lumber
2220 Middlebury Street
Elkhart, Indiana 46516**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-16088-00130	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: August 4, 2003 Expiration Date: August 4, 2008

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary trailer frame manufacturing plant.

Responsible Official:	John Hughes, President
Source Address:	2220 Middlebury Street, Elkhart, Indiana 46516
Mailing Address:	P.O. Box 1055, Elkhart, Indiana 46515
General Source Phone Number:	(574) 522-7800
SIC Code:	3499
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Minor Source, under PSD
	Major Source, Section 112 of the Clean Air Act

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This trailer manufacturing company consists of two (2) plants:

- (a) Plant 1 is located at 2210 Middlebury Street, Elkhart, Indiana; and
- (b) Plant 2 is located at 2220 Middlebury Street, Elkhart, Indiana.

Since the two (2) plants are located on contiguous properties, have the same SIC codes, and are owned by one (1) company, they will be considered one (1) source, effective from the date of issuance of this Part 70 permit.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) surface coating operation using three (3) air-assisted airless spray guns, identified as Frame Coating - Plant 2, with a combined maximum capacity of 4 metal trailer frames per hour (4000 pounds of steel), using dry filters with a 95% collection efficiency for particulate matter overspray control, exhausting to vents F1 and F2, and installed in April 1989.
- (b) Welding operations consisting of forty-nine (49) MIG welding stations, eleven (11) submerged arc welding stations, four (4) oxyacetylene cutting stations, and one (1) plasma cutter divided into four (4) production lines. Each station is fully portable and can be transported between plants and production lines, depending on work requirements:
 - (1) Line 1: Seventeen (17) MIG welding stations with a combined maximum capacity of 2000 pounds of steel and 52.8 pounds of electrodes per hour and oxyacetylene cutting operations with a maximum metal cutting rate of 24 inches per minute for metal 8 inches thick, identified together as Line 1 - Frames and Parts, located in Plant 2.

- (2) Line 2: Nine (9) MIG welding stations and three (3) submerged arc welding stations with a combined maximum capacity of 2000 pounds of steel and 52.8 pounds of electrodes per hour and oxyacetylene cutting operations with a maximum metal cutting rate of 24 inches per minute for metal 8 inches thick, identified together as Line 2 - Frames, located in Plant 2.
- (3) Line 3: Two (2) MIG welding stations and four (4) submerged arc welding stations with a combined maximum capacity of 2000 pounds of steel and 52.8 pounds of electrodes per hour and oxyacetylene cutting operations with a maximum metal cutting rate of 24 inches per minute for metal 8 inches thick, identified together as Line 3 - Frames, located in Plant 2.
- (4) Line 4: Twenty-one (21) MIG welding stations and four (4) submerged arc welding stations with a combined maximum capacity of 3000 pounds of steel and 28.1 pounds of electrodes per hour, oxyacetylene cutting operations with a maximum metal cutting rate of 24 inches per minute for metal 8 inches thick, and one (1) plasma cutter, identified together as Line 4 - Frames, located in Plant 1.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment not associated with the production process [326 IAC 6-3].

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because it is a major source, as defined in 326 IAC 2-7-1(22).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1), (3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the

emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
Telephone Number: 574-245-4870, or toll free 1-800-753-5519 (Northern Regional Office)

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted
- by this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this

permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is submitted at least nine (9) months prior to the date of the expiration of this permit. If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due, it shall be considered timely. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section) to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [40 CFR 52, Subpart P] [326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52, Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the source submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or U.S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated upon permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on August 8, 2000.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance as defined in 40 CFR 68 is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B - Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]
-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6 that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) surface coating operation using three (3) air-assisted airless spray guns, identified as Frame Coating - Plant 2, with a combined maximum capacity of 4 metal trailer frames per hour (4000 pounds of steel), using dry filters with a 95% collection efficiency for particulate matter overspray control, exhausting to vents F1 and F2, and installed in April 1989.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations, Conditions and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Requirements [326 IAC 2-2]

Any change or modification that increases the VOC PTE of the surface coating operation to greater than two hundred fifty (250) tons per consecutive twelve (12) month period shall require prior OAQ approval.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the Permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds (VOC) in excess of three and five-tenths (3.5) pounds VOC per gallon of coating, excluding water, delivered to a Frame Coating - Plant 2 coating applicator that applies extreme performance coatings.

D.1.3 Volatile Organic Compounds (VOC), Clean-Up Requirements [326 IAC 8-2-9(f)]

Pursuant to 326 IAC 8-2-9(f), solvent sprayed from application equipment of Frame Coating - Plant 2 during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to Part 70 Operating Permit T039-7210-00130, issued on October 6, 1998, and 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.5 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to Part 70 Operating Permit T039-7210-00130, issued on October 6, 1998 and 40 CFR 52, Subpart P, the PM from the surface coating operation Frame Coating - Plant 2 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 Particulate Control

Pursuant to Part 70 Operating Permit T039-7210-00130, issued on October 6, 1998, and in order to comply with Conditions D.1.4 and D.1.5, the dry filters for particulate control shall be in place and control emissions from the surface coating facility at all times that the spray coating booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring [40 CFR 64]

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Weekly observations shall be performed of the overspray from the surface coating booth vents while the booth is in operation.
- (c) Monthly inspections shall be performed of the particulate emissions from each vent and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Compliance with these conditions satisfies CAM.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as indicated. All records maintained shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The cleanup solvent usage for each month.
- (4) The total VOC usage for each month.
- (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of daily filter inspections, weekly overspray observations, and monthly rooftop inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Welding operations consisting of forty-nine (49) MIG welding stations, eleven (11) submerged arc welding stations, four (4) oxyacetylene cutting stations, and one (1) plasma cutter divided into four (4) production lines. Each station is fully portable and can be transported between plants and production lines, depending on work requirements:

- (a) Line 1: Seventeen (17) MIG welding stations with a combined maximum capacity of 2000 pounds of steel and 52.8 pounds of electrodes per hour and oxyacetylene cutting operations with a maximum metal cutting rate of 24 inches per minute for metal 8 inches thick, identified together as Line 1 - Frames and Parts, located in Plant 2.
- (b) Line 2: Nine (9) MIG welding stations and three (3) submerged arc welding stations with a combined maximum capacity of 2000 pounds of steel and 52.8 pounds of electrodes per hour and oxyacetylene cutting operations with a maximum metal cutting rate of 24 inches per minute for metal 8 inches thick, identified together as Line 2 - Frames, located in Plant 2.
- (c) Line 3: Two (2) MIG welding stations and four (4) submerged arc welding stations with a combined maximum capacity of 2000 pounds of steel and 52.8 pounds of electrodes per hour and oxyacetylene cutting operations with a maximum metal cutting rate of 24 inches per minute for metal 8 inches thick, identified together as Line 3 - Frames, located in Plant 2.
- (d) Line 4: Twenty-one (21) MIG welding stations and four (4) submerged arc welding stations with a combined maximum capacity of 3000 pounds of steel and 28.1 pounds of electrodes per hour, oxyacetylene cutting operations with a maximum metal cutting rate of 24 inches per minute for metal 8 inches thick, and one (1) plasma cutter, identified together as Line 4 - Frames, located in Plant 1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-1]

Pursuant to 326 IAC 6-3-1, the following manufacturing processes on each production line shall be exempt from 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes):

- (a) Welding, provided that less than six hundred twenty-five (625) pounds of rod or wire is consumed per day.
- (b) Torch cutting, provided that less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness or less is cut.

Any change or modification resulting in an increase in usage or cutting rate above the listed exemption limit requires prior OAQ approval. This requirement is not federally enforceable.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.3 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1(a), the Permittee shall maintain monthly purchase records to document rod or wire usage. Records shall be complete and sufficient to establish compliance with the usage limits established in Condition D.2.1(a).
- (b) To document compliance with Condition D.2.1(b), the Permittee shall maintain monthly cutting records. Records shall be complete and sufficient to establish compliance with the limits established in Condition D.2.1(b).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: DBA Venture Welding, Inc., Division of Banks Lumber
Source Address: 2220 Middlebury Street, Elkhart, Indiana 46516
Mailing Address: P.O. Box 1055, Elkhart, Indiana 46515
Part 70 Permit No.: T039-16088-00130

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: DBA Venture Welding, Inc., Division of Banks Lumber
Source Address: 2220 Middlebury Street, Elkhart, Indiana 46516
Mailing Address: P.O. Box 1055, Elkhart, Indiana 46515
Part 70 Permit No.: T039-16088-00130

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">c The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); andc The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. |
|---|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: DBA Venture Welding, Inc., Division of Banks Lumber
Source Address: 2220 Middlebury Street, Elkhart, Indiana 46516
Mailing Address: P.O. Box 1055, Elkhart, Indiana 46515
Part 70 Permit No.: T039-16088-00130

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: DBA Venture Welding, Inc., Division of Banks Lumber
 Source Location: 2220 Middlebury Street, Elkhart, Indiana 46516
 County: Elkhart
 SIC Code: 3499
 Operation Permit No.: T039-16088-00130
 Permit Reviewer: Chrystal Wagner

On May 19, 2003, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that DBA Venture Welding, Inc., Division of Banks Lumber had applied for a Part 70 Operating Permit to operate a trailer frame manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On May 29, 2003, William D. Gabbard, Gabbard Environmental Services, Inc., on behalf of DBA Venture Welding, Inc., Division of Banks Lumber, submitted comments on the proposed Part 70 permit.

Upon further review, OAQ has decided to make the following revisions to the permit (**bolded** language has been added, ~~struck~~ language has been deleted). The Table of Contents has been modified to reflect these changes.

Section A

Comment 1:

Condition A.3 - Emission Units and Pollution Control Equipment Summary. Ventilation of the surface coating operation is described as exhausting to "stacks F1 and F2." Describing these as "vents" would be more appropriate.

Response to Comment 1:

OAQ agrees. The description of these emission points has been changed in Condition A.3. The description has also been changed in Section D.1 and Condition D.1.9. This is descriptive language and does not change testing or monitoring requirements or other conditions contained in this permit.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
 [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) surface coating operation using three (3) air-assisted airless spray guns, identified as Frame Coating - Plant 2, with a combined maximum capacity of 4 metal trailer frames per hour (4000 pounds of steel), using dry filters with a 95% collection efficiency for particulate matter overspray control, exhausting to ~~stacks~~ **vents** F1 and F2, and installed in April 1989.

- (b) Welding operations consisting of forty-nine (49) MIG welding stations, eleven (11) submerged arc welding stations, four (4) oxyacetylene cutting stations, and one (1) plasma cutter divided into four (4) production lines. Each station is fully portable and can be transported between plants and production lines, depending on work requirements:
- (1) Line 1: Seventeen (17) MIG welding stations with a combined maximum capacity of 2000 pounds of steel and 52.8 pounds of electrodes per hour and oxyacetylene cutting operations with a maximum metal cutting rate of 24 inches per minute for metal 8 inches thick, identified together as Line 1 - Frames and Parts, located in Plant 2.
 - (2) Line 2: Nine (9) MIG welding stations and three (3) submerged arc welding stations with a combined maximum capacity of 2000 pounds of steel and 52.8 pounds of electrodes per hour and oxyacetylene cutting operations with a maximum metal cutting rate of 24 inches per minute for metal 8 inches thick, identified together as Line 2 - Frames, located in Plant 2.
 - (3) Line 3: Two (2) MIG welding stations and four (4) submerged arc welding stations with a combined maximum capacity of 2000 pounds of steel and 52.8 pounds of electrodes per hour and oxyacetylene cutting operations with a maximum metal cutting rate of 24 inches per minute for metal 8 inches thick, identified together as Line 3 - Frames, located in Plant 2.
 - (4) Line 4: Twenty-one (21) MIG welding stations and four (4) submerged arc welding stations with a combined maximum capacity of 3000 pounds of steel and 28.1 pounds of electrodes per hour, oxyacetylene cutting operations with a maximum metal cutting rate of 24 inches per minute for metal 8 inches thick, and one (1) plasma cutter, identified together as Line 4 - Frames, located in Plant 1.

SECTION D.1 - Facility Description [326 IAC 2-7-5(15)]:

One (1) surface coating operation using three (3) air-assisted airless spray guns, identified as Frame Coating - Plant 2, with a combined maximum capacity of 4 metal trailer frames per hour (4000 pounds of steel), using dry filters with a 95% collection efficiency for particulate matter overspray control, exhausting to ~~stacks~~ **vents** F1 and F2, and installed in April 1989.

D.1.9 Monitoring [40 CFR 64]

-
- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (b) Weekly observations shall be performed of the overspray from the surface coating booth ~~stacks~~ **vents** while the booth is in operation.
 - (c) Monthly inspections shall be performed of the particulate emissions from ~~the stack~~ **each vent** and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -

Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Compliance with these conditions satisfies CAM.

Section B

OAQ has made the following changes to Section B. These changes are not the result of public comments received during a comment period. OAQ has received comments regarding these conditions in other permits and believes that the new conditions more accurately reflect the applicable requirements.

Change B-1:

The duty to supplement an application is not an ongoing requirement after the permit is issued; therefore, Condition B.7 - Duty to Supplement and Provide Information has been modified and Condition B.7(a) has been removed.

B.7 Duty to Supplement and Provide Information ~~[326 IAC 2-7-4(b)]~~ [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- ~~(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:~~

~~_____ Indiana Department of Environmental Management
 _____ Permits Branch, Office of Air Quality
 _____ 100 North Senate Avenue, P.O. Box 6015
 _____ Indianapolis, Indiana 46206-6015~~

~~_____ The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

- ~~_____ (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.~~

- ~~(e) (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.~~

Change B-2:

Condition B.11(b) was revised to clarify that required record keeping needs to be implemented as well as the rest of the plan to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit. Condition B.11(c) has been revised to clarify that OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The requirements to keep records of preventive maintenance in Condition B.11(d) has been moved to Section D. Because the general record keeping requirements (i.e., retained for 5 years) are in Section C, it is not necessary to include them in this condition or in the D condition. At some sources, an OMM Plan

is required. Instead of having two separate plans, the OMM Plan may satisfy the PMP requirements. Therefore, Condition B.11(d) has been added to this condition.

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1), (3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

-
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, **including any required record keeping**, as necessary to ensure that failure to implement a PMP does not cause or contribute to a ~~violation~~ **an exceedance** of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or ~~contributes to any violation~~ **is the primary contributor to an exceedance of any limitation on emissions or potential to emit**. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) ~~Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time~~ **To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.**

Change B-3:

In order to clarify that an amendment or modification will not be required for the addition, operation or removal of a nonroad engine, Condition B.18(d) has been added to Condition B.18 - Permit Amendment or Modification.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

-
- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

Any such application shall be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) **No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.**

Change B-4:

For clarity, additional rule cites have been added to Condition B.22 - Inspection and Entry.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have** ~~Have~~ access to and copy any records that must be kept under the conditions of this permit;
- (c) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect** ~~inspect~~ any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample** ~~Sample~~ or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize** ~~Utilize~~ any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

Section C

OAQ has made the following changes to Section C. These changes are not the result of public comments received during a comment period. OAQ has received comments regarding these conditions in other permits and believes that the new conditions more accurately reflect the applicable requirements.

Change C-1:

The following change has been made to Condition C.1 - Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour:

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [40 CFR 52, Subpart P] [326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52, Subpart P, ~~the allowable~~ particulate matter emissions ~~rate~~ from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), ~~the allowable~~ particulate emissions ~~rate~~ from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

Change C-2:

Condition C.8 - Asbestos Abatement Projects has been revised to clarify that the requirement to have an Indiana Accredited Asbestos inspector is not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
 Asbestos Section, Office of Air Quality
 100 North Senate Avenue, P.O. Box 6015
 Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- ~~(f)~~ (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. ~~The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.~~

Change C-3:

Condition C.14 - Risk Management Plan has been revised so that it is more straightforward. This condition has been revised so that it requires the source to comply with the applicable requirements of 40 CFR 68 if a regulated substance is present at a source in more than a threshold quantity.

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, ~~subject to as defined in 40 CFR 68;~~ is present at a source in more than a threshold quantity, ~~40 CFR 68 is an applicable requirement and the Permittee shall submit:~~ **the source must comply with the applicable requirements of 40 CFR 68.**

~~(a) A compliance schedule for meeting the requirements of 40 CFR 68; or~~

~~(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);~~

~~All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Change C-4:

Failure to take reasonable response steps shall be considered deviation of the permit; therefore, Condition C.15(b)(4) was revised. Language was added to Condition C.15(e) to clarify that the records that need to be kept are those instances when, in accordance with Section D, response steps are taken.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each

compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall ~~constitute a violation of~~ **be considered a deviation from** the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B - Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, **in accordance with Section D**, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Change C-5:

In order to clarify which documents need to be certified by the responsible official, the following update has been made to Condition C.16:

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
 - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
 - (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The **response action** documents submitted pursuant to this condition do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Comment 2:

Condition C.17 - Emission Statement. Has the twelve consecutive month period for the annual emission statement been changed from December 1 to November 30 to a calendar year basis?

Response to Comment 2:

Proposed amendments to the emission reporting rules were preliminarily adopted in April 2001. No further action has been taken with this rulemaking. The time period to be covered in the emission statement has not been changed. Pursuant to 326 IAC 2-6-2, the “emission statement operating year” for sources located in Elkhart County, and that have potential VOC emissions greater than or equal to ten (10) tons per year, is the twelve (12) consecutive month period from December 1 to November 30.

Change C-6:

Condition C.17(a) - Emission Statement has been updated to include the specific rule cite that defines the regulated pollutants being referred to in this condition.

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6 that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of ~~other~~ regulated pollutants (as defined by 326 IAC 2-7-1(32) ("**Regulated pollutant which is used only for purposes of Section 19 of this rule**") from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

Change C-7:

It is acceptable for records to be electronically accessible instead of being physically present at a source. Therefore, the following update has been made to Condition C.18:

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required **monitoring** data, reports and support information **required by this permit** shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be ~~kept physically present or electronically accessible~~ at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

Section D

Comment 3:

Condition D.2.3 - Record Keeping Requirements. Is there an alternative to the new record keeping requirements in this section? The current operating permit has no record keeping requirements.

Response to Comment 3:

This rule was amended in 2002 to provide exemptions for certain manufacturing processes from the requirements of 326 IAC 6-3-2(e). The process weight rates associated with welding and torch cutting operations make it difficult to comply with the calculated emission rate. Therefore, particulate emission limitations were developed for welding and torch cutting, providing an exemption under 326 IAC 6-3-1.

Pursuant to 326 IAC 6-3-1(b)(9), welding is exempt from the particulate emission limitations for manufacturing processes, provided that less than six hundred twenty-five (625) pounds of rod or wire is consumed per day. Documenting compliance with this limitation requires record keeping that consists of tracking and logging the usage of rod or wire.

Pursuant to 326 IAC 6-3-1(b)(10), torch cutting is exempt from the particulate emission limitations for manufacturing processes, provided that less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness or less is cut. Documenting compliance with this limitation requires record keeping that consists of tracking and logging torch cutting.

If the Permittee is unable to meet the exemption criteria in 326 IAC 6-3-1(b), the manufacturing processes of welding and torch cutting shall comply with the emission limitations in 326 IAC 6-3-2(e). The limitation is an hourly rate of particulate emissions from welding and torch cutting, based on the process weight rates. Record keeping is also required to document compliance with 326 IAC 6-3-2(e).

Condition D.2.3 has been modified to simplify the welding and torch cutting record keeping requirements.

D.2.3 Record Keeping Requirements

-
- (a) To document compliance with Condition D.2.1(a), the Permittee shall maintain ~~daily~~ **monthly purchase** records ~~of to document~~ rod or wire usage. Records shall be complete and sufficient to establish compliance with the usage limits established in Condition D.2.1(a).
 - (b) To document compliance with Condition D.2.1(b), the Permittee shall maintain ~~daily~~ **monthly** cutting records. Records shall be complete and sufficient to establish compliance with the limits established in Condition D.2.1(b).
 - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 4:

Please recheck the calculations for potential emissions from welding and cutting. We have a similarly permitted facility in Howe, Indiana. It is a larger plant, but has less potential particulate emissions.

Response to Comment 4:

The Howe facility is similar to the Elkhart facility because it has surface coating and welding operations. The surface coating at the Howe facility is dip coating, whereas the surface coating at the Elkhart facility is spray coating. Dip coating does not generate particulate. Transfer efficiency for dip coating is considered to be 100%.

Spray coating metal trailer frames with air-assisted airless spray guns has a lower transfer efficiency. For calculating PTE, the transfer efficiency for spray coating is considered to be 10%. Spray coating creates particles when solids in the coatings are atomized. Calculations for potential particulate emissions from spray coating are based on the coating density, weight ratio of solids in the coating, throughput, and transfer efficiency. The cleanup solvent used at the Elkhart facility does not generate particles because it does not contain solids. Therefore, Asphalt Coating 740-B is the only source of potential particulate emissions from the Elkhart surface coating line. Dry particulate filters are used on the paint booth exhaust vents F1 and F2 to control particulate emissions from the spray coating.

Welding and torch cutting also contribute to potential particulate emissions. Based on throughputs provided by the Permittee, potential particulate emissions for welding and torch cutting at the Elkhart facility are much greater than at the Howe facility.

The Howe facility has 41 MIG welding stations, each with a maximum throughput of three (3) pounds of rod/wire consumed per hour. Particulate from torch cutting is based on one (1) cutting station with a cutting rate of 3.5 inches per minute of stock eight (8) inches in thickness. Potential particulate emissions at this facility are 11 tons per year.

The Elkhart facility has 48 MIG and 11 submerged arc welding stations, four (4) oxyacetylene and one (1) plasma cutting stations. Each MIG welding station has a maximum throughput of 120 pounds of rod/wire consumed per hour. Each submerged arc welding station has a maximum throughput of 12 pounds of rod/wire consumed per hour. Particulate from torch cutting is based on four (4) oxyacetylene cutting stations, each with a cutting rate of 24 inches per minute of stock eight (8) inches in thickness. Particulate from plasma cutting is based on one (1) plasma cutting station with a maximum cutting rate of 150 inches per minute. Potential particulate emissions from welding and torch cutting at this facility are 195 tons per year.

If the throughput and/or maximum rod/wire usage provided for this source is inaccurate, potential particulate emissions from welding and torch cutting can be adjusted.

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD)
for a Part 70 Operating Permit Renewal**

Source Background and Description

Source Name:	DBA Venture Welding, Inc., Division of Banks Lumber
Source Location:	2220 Middlebury Street, Elkhart, Indiana 46516
County:	Elkhart
SIC Code:	3499
Operation Permit No.:	T039-16088-00130
Permit Reviewer:	Chrystal Wagner

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from DBA Venture Welding, Inc., Division of Banks Lumber relating to the operation of a trailer frame manufacturing plant.

Source Definition

This trailer frame manufacturing company consists of two (2) plants:

- (a) Plant 1 is located at 2210 Middlebury Street, Elkhart, Indiana 46516; and
- (b) Plant 2 is located at 2220 Middlebury Street, Elkhart, Indiana 46516.

Since the two (2) plants are located on contiguous properties, have the same SIC codes, and are owned by one (1) company, they will be considered one (1) source. The DBA Venture Welding, Inc. plant at 701 Collins Road in Elkhart is considered as a separate source. The two (2) sources are considered separate because they are operated independently, do not support each other, and are more than one (1) mile apart.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) One (1) surface coating operation using three (3) air-assisted airless spray guns, identified as Frame Coating - Plant 2, with a combined maximum capacity of 4 metal trailer frames per hour (4000 pounds of steel), using dry filters with a 95% collection efficiency for particulate matter overspray control, exhausting to stacks F1 and F2, and installed in April 1989.
- (2) Welding operations consisting of forty-nine (49) MIG welding stations, eleven (11) submerged arc welding stations, four (4) oxyacetylene cutting stations, and one (1) plasma cutter divided into four (4) production lines. Each station is fully portable and can be transported between plants and production lines, depending on work requirements:
 - (a) Line 1: Seventeen (17) MIG welding stations with a combined maximum capacity of 2000 pounds of steel and 52.8 pounds of electrodes per hour and oxyacetylene

cutting operations with a maximum metal cutting rate of 24 inches per minute for metal 8 inches thick, identified together as Line 1 - Frames and Parts, located in Plant 2.

- (b) Line 2: Nine (9) MIG welding stations and three (3) submerged arc welding stations with a combined maximum capacity of 2000 pounds of steel and 52.8 pounds of electrodes per hour and oxyacetylene cutting operations with a maximum metal cutting rate of 24 inches per minute for metal 8 inches thick, identified together as Line 2 - Frames, located in Plant 2.
- (c) Line 3: Two (2) MIG welding stations and four (4) submerged arc welding stations with a combined maximum capacity of 2000 pounds of steel and 52.8 pounds of electrodes per hour and oxyacetylene cutting operations with a maximum metal cutting rate of 24 inches per minute for metal 8 inches thick, identified together as Line 3 - Frames, located in Plant 2.
- (d) Line 4: Twenty-one (21) MIG welding stations and four (4) submerged arc welding stations with a combined maximum capacity of 3000 pounds of steel and 28.1 pounds of electrodes per hour, oxyacetylene cutting operations with a maximum metal cutting rate of 24 inches per minute for metal 8 inches thick, and one (1) plasma cutter, identified together as Line 4 - Frames, located in Plant 1.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour. (Twenty-three (23) enclosed space heaters, one (1) make-up air unit).
- (b) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (c) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
- (d) Cleaners and solvents having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or, having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3].
- (f) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (g) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (h) On-site fire and emergency response training approved by the department.
- (i) Other categories with emissions below insignificant thresholds:

- (1) One (1) 2,000 gallon diesel fuel storage tank dispensing a maximum of 2,900 gallons per month.
- (2) Exxsol D-40 (mineral spirit) cleaning solvent with a vapor pressure of 2.0 mmHg at 68EF.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

Part 70 Operating Permit T039-7210-00130, issued on October 6, 1998.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (a) Part 70 Operating Permit T039-7210-00130, issued on October 6, 1998

Condition A.2(1):

One (1) surface coating operation using three (3) air-assisted airless spray guns, identified as Frame Coating - Plant 1, with a combined maximum capacity of 6 metal RV frames per hour (3000 pounds of steel), using dry filters for particulate matter overspray control, and exhausting to stack E1.

Reason not incorporated:

The surface coating operation identified as Frame Coating - Plant 1 has been dismantled and removed from the source. Therefore, all references to Frame Coating - Plant 1 (including specific references in Section D.1) have not been incorporated.

- (b) Part 70 Operating Permit T039-7210-00130, issued on October 6, 1998

Condition D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]:

The input VOC from these facilities [surface coating facilities Frame Coating - Plant 1, and Frame Coating - Plant 2] be limited to less than 250 tons, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period, compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

Reason not incorporated:

Because the surface coating facility Frame Coating - Plant 1 has been removed, this limit is no longer necessary. The VOC PTE for the surface coating is less than 250 tons per consecutive 12 month period. However, record keeping is still required to document that VOC emissions are below the major threshold.

- (c) Part 70 Operating Permit T039-7210-00130, issued on October 6, 1998

Condition D.1.12 Reporting Requirements:

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

Reason not incorporated:

Reporting is no longer necessary because the condition limiting the VOC input has been removed.

- (d) Part 70 Operating Permit T039-7210-00130, issued on October 6, 1998

Condition D.2.1 Particulate Matter (PM) [326 IAC 6-3]:

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the welding and cutting operations shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Reason not incorporated:

Revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) provide exemption criteria for the manufacturing processes of welding and torch cutting. The permit condition has been replaced with a material usage rate pursuant to 326 IAC 6-3-1(b) that exempts each process from 326 IAC 6-3-2 requirements.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on September 11, 2002.

A notice of completeness letter was mailed to the source on October 17, 2002.

Emission Calculations

See Appendix A, page 1 through 5, of this document for detailed emissions calculations.

Unrestricted Potential Emissions

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	402.21
PM-10	402.21
SO ₂	0
VOC	198.49
CO	0
NO _x	2

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Mn	19.34
Ni	0.02
Cr	0.06
TOTAL	19.42

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions and VOC emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of a Part 70 Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original Part 70 Operating Permit, T039-2710-00130, issued on October 6, 1998. In order to comply with particulate matter limitations pursuant to 326 IAC 6-3, dry filters must be in place any time the surface coating line is in operation. The dry particulate filters have an actual control efficiency of 95%, thereby reducing the potential to emit.

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating: Frame Coating - Plant 2	10.34	10.34	-	198.49	-	-	-
Welding and Torch Cutting Operations: Line 1, Line 2, Line 3, Line 4	195.35	195.35	-	-	-	-	19.42
Total PTE After Issuance	205.69	205.69	-	198.49	-	-	19.42

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	--
PM-10	0.31
SO ₂	0.00
VOC	52.12
CO	0.07
NO _x	0.37
HAP (specify)	--

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for PM-10. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) The surface coating operation, Frame Coating - Plant 2, has applicable compliance assurance monitoring (CAM) requirements pursuant to 40 CFR 64.1. CAM applies to the surface coating operation, Frame Coating - Plant 2 because it uses a control device (dry particulate filter) to achieve compliance with an applicable rule (326 IAC 6-3), and it has an uncontrolled PTE for particulate matter that is greater than 100 tons per year. CAM requirements for Frame Coating - Plant 2 are daily filter inspections, weekly overspray observations, and monthly rooftop inspections.
- (b) The one (1) 2,000 gallon fuel storage tank and the two (2) 3,500 gallon surface coating storage tanks are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.110b (Subpart Kb), because the design capacity for each storage tank is less than 40 m³ (10,567 gallons).
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.
- (d) This source is not subject to the 112(j) MACT Hammer requirements under 40 CFR 63.50. Potential HAP emissions from the welding lines are greater than ten (10) tons per year. However, there are no MACT standards being developed for this source category.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on August 8, 2000. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-2 (Prevention of Significant Deterioration)

326 IAC 2-2 (Prevention of Significant Deterioration) does not apply because the source was constructed in 1992 in Elkhart County, a nonattainment area for ozone. Elkhart County was redesignated to attainment for ozone in 1994. The source was considered a major source under PSD, because potential VOC emissions were greater than 250 tons per year. This source is not considered to be one of the 28 listed source categories under 326 IAC 2-2. When the Part 70 Operating Permit, T039-2710-00130, was issued in 1998, the VOC limit was relaxed from 99 tons per 365 days to 249 tons per 365 days. The surface coating operation at Plant 1 was removed in 1999, reducing potential VOC emissions to 198.49 tons per year. Potential VOC emissions from Frame Coating - Plant 2 are less than 250 tons per consecutive 12-month period. Therefore, 326 IAC 2-2 will not apply. However, any change or modification that changes the VOC PTE requires prior OAQ approval.

326 IAC 2-4.1 (New Source Toxics Control)

The source is not subject to 326 IAC 2-4.1 (New Source Toxics Control) because it was constructed before July 27, 1997.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year for volatile organic compounds (VOC) and particulate matter. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

Surface Coating: Frame Coating - Plant 2

326 IAC 6-3 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by U.S. EPA into the Indiana State Implementation Plan (SIP). Therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to Part 70 Operating Permit T039-7210-00130, issued on October 6, 1998, and 40 CFR 52, Subpart P, the particulate matter (PM) from the surface coating facility Frame Coating - Plant 2 shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the spray coating is in operation, in order to comply with this limit.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Under the rule revision, pursuant to 326 IAC 6-3-2, particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The surface coating facility, Frame Coating - Plant 2 is subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating) because it was constructed after November 1, 1980 and has potential emissions of twenty-five (25) tons per year or greater of VOC. Frame Coating - Plant 2 existed as of July 1, 1990, is located in Elkhart County, and has actual emissions greater than fifteen (15) pounds of VOC per day before add-on controls. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations):

- (a) The volatile organic compound (VOC) content of coating delivered to the applicator at the surface coating operation, Frame Coating - Plant 2, shall not exceed 3.5 pounds VOC per gallon coating less water for extreme performance coatings.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, Frame Coating - Plant 2 is in compliance with this requirement.

Welding and Torch Cutting Operations: Line 1, Line 2, Line 3, Line 4

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Under the rule revision, the following manufacturing processes are subject to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes):

- (a) Welding. Pursuant to 326 IAC 6-3-1(b)(9), the manufacturing process of welding is exempt from the emission rate limitations of 326 IAC 6-3-2, provided the welding in the production line consumes less than six hundred twenty-five (625) pounds of rod or wire per day.
- (b) Torch cutting. Pursuant to 326 IAC 6-3-1(b)(10), the manufacturing process of torch cutting is exempt from the emission rate limitations of 326 IAC 6-3-2, provided the torch cutting in the production line is less than three thousand four hundred (3,400) inches per hour of stock one (1) inch in thickness.

Provided the usage rates of the manufacturing processes of welding and torch cutting meet the exemption criteria, each manufacturing process shall be exempt from 326 IAC 6-3. Manufacturing processes that have usage rates exceeding the exemption criteria shall comply with the emission rate calculated in 326 IAC 6-3-2.

Listed Insignificant Activities

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

The brazing equipment, cutting torches, soldering equipment, and welding equipment that are not associated with the production process are considered insignificant activities and are not subject to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because they meet the exemption criteria pursuant to 326 IAC 6-3-1(b) and are trivial activities as defined in 326 IAC 2-7-1(40).

The welding and torch cutting production lines also meet the exemption criteria pursuant to 326 IAC 6-3-1(b), as described above.

326 IAC 6-4 (Fugitive Dust Emissions)

Paved and unpaved roads and parking lots with public access are subject to 326 IAC 6-4 (Fugitive Dust Emissions). This is covered under Section C.5 of the permit.

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

The 2000 gallon diesel fuel storage tank is not subject to the requirements of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities) because the storage capacity is less than thirty-nine thousand (39,000) gallons.

326 IAC 8-4-6 (Gasoline Dispensing Facilities)

The fuel dispensing facility is not subject to the requirements of 326 IAC 8-4-6 (Gasoline Dispensing Facilities), because the facility dispenses a petroleum fuel other than gasoline.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The storage tanks are not subject to 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) because this rule applies to solvent storage tanks located in Clark, Floyd, Lake, or Porter Counties.

Testing Requirements

No testing is required at this time. Compliance monitoring conditions for the surface coating operation Frame Coating - Plant 2 with dry filter for particulate control ensures continual compliance with the PM-10 emission limits contained in the permit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The Permittee shall keep records sufficient to document that the total source VOC PTE is less than 250 tons per consecutive 12-month period. These records shall include VOC emissions from the spray coating operation, Frame Coating - Plant 2. Compliance with this requirement will ensure that 326 IAC 2-2 (PSD) does not apply.
2. Frame Coating - Plant 2 has applicable compliance assurance monitoring (CAM) as specified below:
 - (a) Daily inspections to verify the placement, integrity and particle loading of the filters.
 - (b) Weekly observations shall be performed of the overspray from the surface coating booth stacks while the booth is in operation.
 - (c) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground.

Conclusion

The operation of this trailer frame manufacturing plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T039-16088-00130**.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: DBA Venture Welding, Inc., Division of Banks Lumber
Address City IN Zip: 2220 Middlebury Street, Elkhart, IN 46516
CP: T039-16088-00130
Pit ID: 039-00130
Reviewer: Chrystal Wagner
Date: March 5, 2003

Frame Coating - Plant 2

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Asphalt Coating 740-B	7.4	44.60%	0.0%	44.6%	0.0%	55.40%	3.20000	4.000	3.30	3.30	42.25	1013.88	185.03	206.86	5.96	10%
Cleanup Solvent Exxsol D 40	6.4	100.00%	0.0%	100.0%	0.0%	0.00%	0.12000	4.000	6.40	6.40	3.07	73.73	13.46	0.00	ERR	0%

State Potential Emissions

Add worst case coating to all solvents

45.32

1087.61

198.49

206.86

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Company Name: DBA Venture Welding, Inc., Division of Banks Lumber
Address City IN Zip: 2220 Middlebury Street, Elkhart, IN 46516
CP: T039-16088-00130
Plt ID: 039-00130
Reviewer: Chrystal Wagner
Date: March 5, 2003

Line 1 - Plant 2

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Submerged Arc				0.036	0.011			0.000	0.000	0.000	0	0.000
Metal Inert Gas (MIG)(carbon steel)	17	120		0.0055	0.0005			11.220	1.020	0.000	0	1.020
Stick (E7018 electrode)				0.0211	0.0009			0.000	0.000	0.000	0	0.000
Tungsten Inert Gas (TIG)(carbon steel)				0.0055	0.0005			0.000	0.000	0.000	0	0.000
Oxyacetylene(carbon steel)				0.0055	0.0005			0.000	0.000	0.000	0	0.000
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	1	8	24	0.1622	0.0005	0.0001	0.0003	1.869	0.006	0.001	0.003	0.010
Oxymethane				0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**				0.0039				0.000	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								13.09	1.03	0.00	0.00	1.03
Potential Emissions lbs/day								314.13	24.62	0.03	0.08	24.73
Potential Emissions tons/year								57.33	4.49	0.01	0.02	4.51

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Welding and other flame cutting emission factors are from an internal training session document, "Welding and Flame Cutting". See Rebecca Mason if you need a copy.

Refer to AP-42, Chapter 12.19 for additional emission factors for welding.

Company Name: DBA Venture Welding, Inc., Division of Banks Lumber
Address City IN Zip: 2220 Middlebury Street, Elkhart, IN 46516
CP: T039-16088-00130
Plt ID: 039-00130
Reviewer: Chrystal Wagner
Date: March 5, 2003

Line 2 - Plant 2

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Submerged Arc	3	12		0.036	0.011			1.296	0.396	0.000	0	0.396
Metal Inert Gas (MIG)(carbon steel)	9	120		0.0055	0.0005			5.940	0.540	0.000	0	0.540
Stick (E7018 electrode)				0.0211	0.0009			0.000	0.000	0.000	0	0.000
Tungsten Inert Gas (TIG)(carbon steel)				0.0055	0.0005			0.000	0.000	0.000	0	0.000
Oxyacetylene(carbon steel)				0.0055	0.0005			0.000	0.000	0.000	0	0.000
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	1	8	24	0.1622	0.0005	0.0001	0.0003	1.869	0.006	0.001	0.003	0.010
Oxymethane				0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**				0.0039				0.000	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								9.10	0.94	0.00	0.00	0.95
Potential Emissions lbs/day								218.51	22.60	0.03	0.08	22.71
Potential Emissions tons/year								39.88	4.12	0.01	0.02	4.15

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Welding and other flame cutting emission factors are from an internal training session document, "Welding and Flame Cutting". See Rebecca Mason if you need a copy.

Refer to AP-42, Chapter 12.19 for additional emission factors for welding.

Company Name: DBA Venture Welding, Inc., Division of Banks Lumber
Address City IN Zip: 2220 Middlebury Street, Elkhart, IN 46516
CP: T039-16088-00130
Plt ID: 039-00130
Reviewer: Chrystal Wagner
Date: March 5, 2003

Line 3 - Plant 2

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Submerged Arc	4	12		0.036	0.011			1.728	0.528	0.000	0	0.528
Metal Inert Gas (MIG)(carbon steel)	2	120		0.0055	0.0005			1.320	0.120	0.000	0	0.120
Stick (E7018 electrode)				0.0211	0.0009			0.000	0.000	0.000	0	0.000
Tungsten Inert Gas (TIG)(carbon steel)				0.0055	0.0005			0.000	0.000	0.000	0	0.000
Oxyacetylene(carbon steel)				0.0055	0.0005			0.000	0.000	0.000	0	0.000
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	1	8	24	0.1622	0.0005	0.0001	0.0003	1.869	0.006	0.001	0.003	0.010
Oxymethane				0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**				0.0039				0.000	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								4.92	0.65	0.00	0.00	0.66
Potential Emissions lbs/day								118.00	15.69	0.03	0.08	15.80
Potential Emissions tons/year								21.53	2.86	0.01	0.02	2.88

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Welding and other flame cutting emission factors are from an internal training session document, "Welding and Flame Cutting". See Rebecca Mason if you need a copy.

Refer to AP-42, Chapter 12.19 for additional emission factors for welding.

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: DBA Venture Welding, Inc., Division of Banks Lumber
Address City IN Zip: 2220 Middlebury Street, Elkhart, IN 46516
CP: T039-16088-00130
Plt ID: 039-00130
Reviewer: Chrystal Wagner
Date: March 5, 2003

Line 4 and General/Special Use - Plant 1

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Submerged Arc	4	12		0.036	0.011			1.728	0.528	0.000	0	0.528
Metal Inert Gas (MIG)(carbon steel)	21	120		0.0055	0.0005			13.860	1.260	0.000	0	1.260
Stick (E7018 electrode)				0.0211	0.0009			0.000	0.000	0.000	0	0.000
Tungsten Inert Gas (TIG)(carbon steel)				0.0055	0.0005			0.000	0.000	0.000	0	0.000
Oxyacetylene(carbon steel)				0.0055	0.0005			0.000	0.000	0.000	0	0.000
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	1	8	24	0.1622	0.0005	0.0001	0.0003	1.869	0.006	0.001	0.003	0.010
Oxymethane				0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**	1	0.375	150	0.0039				0.035	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								17.49	1.79	0.00	0.00	1.80
Potential Emissions lbs/day								419.80	43.05	0.03	0.08	43.16
Potential Emissions tons/year								76.61	7.86	0.01	0.02	7.88

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick
Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)
Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.
Welding and other flame cutting emission factors are from an internal training session document, "Welding and Flame Cutting". See Rebecca Mason if you need a copy.
Refer to AP-42, Chapter 12.19 for additional emission factors for welding.